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January 14, 2021

FILED VIA ECF

Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Zalmund Zirkind*, S8 19 Cr. 463 (DLC)
*Application for Leave to Permit Defense Counsel to Enter the Courthouse with
Computers*
Sentencing: January 15, 2021

Dear Judge Cote:

This letter is respectfully written to request the opportunity for both defense counsel, Neil M. Schuster and Johanna Zapp, to enter the Courthouse with computers in order to have a backup system to present a video that addresses sentencing related issues. Counsel has confronted certain problems and has been unable to overcome those issues with presenting this video in advance to the Court.

Respectfully submitted,

s/Neil M. Schuster
Neil M. Schuster

NMS:asnd
cc: All parties by ECF

Denise L. Cote
1/15/21